

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

ISABELLA SNEED, )  
 )  
Plaintiff, )  
 )  
-vs- ) Case No. CIV-22-31-R  
 )  
INDEPENDENT SCHOOL DISTRICT ) \*\*CONFIDENTIAL\*\*  
NO. 16 OF PAYNE COUNTY, )  
OKLAHOMA, a/k/a STILLWATER )  
PUBLIC SCHOOL DISTRICT, )  
a/k/a STILLWATER )  
INDEPENDENT SCHOOL DISTRICT )  
NO. 16, )  
 )  
Defendant. )

\* \* \* \* \*

VIDEO DEPOSITION OF ISABELLA GRACE SNEED  
TAKEN PURSUANT TO PROTECTIVE ORDER  
TAKEN ON BEHALF OF THE DEFENDANT  
TAKEN AT 701 SOUTH CINCINNATI AVENUE  
TULSA, OKLAHOMA  
NOVEMBER 1, 2022

\* \* \* \* \*

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REPORTED BY: ASHLEY BALLARD, CSR

**EXHIBIT**  
**1**

A P P E A R A N C E S

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VIDEOGRAPHER: MIKE BALLARD  
Ballard Video Productions

\* \* \* \* \*

S T I P U L A T I O N S

It is hereby stipulated and agreed by and between the parties hereto, that this deposition is being taken pursuant to notice and that the same may be taken at this time and place.

It is further stipulated and agreed that all objections are reserved to the time of trial, except as to form, with the same force and effect as if made at the taking of the deposition.

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1 THE VIDEOGRAPHER: Today is November 1st,  
2 2022. This is the video deposition of Isabella  
3 Sneed in Case CIV-22-31-R. We are on the record at  
4 10:02. The court reporter will now administer the  
5 oath.

6  
7 ISABELLA GRACE SNEED,  
8 being first duly sworn to tell the truth, the whole  
9 truth and nothing but the truth, testified as follows:

10  
11 DIRECT EXAMINATION

12 BY MR. PRIDDY:

13 Q. Please state your full name and -- full legal name  
14 and spell your last name.

15 A. Isabella Grace Sneed, S-n-e-e-d.

16 Q. And Ms. Sneed, I've seen in documents you're  
17 referred to as both Isabella and Bella?

18 A. Yes.

19 Q. So which one do you go by?

20 A. Either one.

21 Q. Which one do you prefer?

22 A. Isabella.

23 Q. Okay. All right. So is it okay if I call you  
24 Isabella here today?

25 A. Yes.

1 Q. What do you like about it?

2 A. The environment. The people I work with.

3 Q. Nice people?

4 A. Uh-huh.

5 Q. You got a nice boss?

6 A. Yes.

7 Q. Who is your boss?

8 A. Terri Flower [sic].

9 Q. What is his position? What is his title?

10 A. It's a lady.

11 Q. Lady. I'm sorry.

12 A. But -- you're fine. She is the retail coordinator  
13 or something like that.

14 Q. Okay. So what grades did you attend at Stillwater  
15 School District? When did you first start  
16 Stillwater, what grade?

17 A. Sixth grade.

18 Q. So Isabella, some schools are set up differently as  
19 far as what's considered elementary, middle school.  
20 Some schools have like a Freshman Academy or a ninth  
21 grade center and then a high school. Do you  
22 understand what I'm asking?

23 A. Uh-huh.

24 Q. Okay. I'm not familiar with Stillwater, so can you  
25 explain to me how it's set up, what the different

1 stages are?

2 A. It's -- I know it's -- middle school is sixth and  
3 seventh; junior high is eighth and ninth; and then  
4 high school is tenth, eleventh, and twelfth.

5 Q. Okay. So you just told me you started in sixth  
6 grade. Would that be at the beginning of the school  
7 year or did you transfer in midyear?

8 A. No, it was the beginning of the school year.

9 Q. So based on what you've just told me, that would be  
10 middle school?

11 A. Yes.

12 Q. Did you complete both sixth and seventh at the  
13 middle school?

14 A. Yes.

15 Q. All right. And then eighth and ninth was junior  
16 high?

17 A. Yes.

18 Q. Did you complete both eighth and ninth?

19 A. Yes.

20 Q. All right. And then tenth grade would be high  
21 school?

22 A. Yes.

23 Q. And eleventh grade would be high school?

24 A. Yes.

25 Q. All right. And then I know you're currently in

1 anything else you did when you went to Stillwater?

2 A. (Witness shakes head back and forth.)

3 Q. Choir? Drama? Debate? Any other sports?

4 A. No.

5 Q. Okay.

6 All right. While attending Stillwater School  
7 District in eighth grade, you had a teacher,  
8 Mr. Morejon. Do you remember him?

9 A. Yes.

10 Q. All right. And he was your history teacher?

11 A. Yes.

12 Q. All right. The junior high, being eighth and ninth  
13 grade, Isabella -- I'm really familiar with Jenks.  
14 They have almost a thousand kids in their class.  
15 Can you give me some idea of how big Stillwater is  
16 as far as the class size?

17 A. Probably 300, 400 kids in a grade.

18 Q. Okay. So the graduating class at Stillwater is 3-  
19 or 400 kids?

20 A. Yes.

21 Q. Okay. Are you guessing or do you know?

22 A. Guessing.

23 Q. Okay.

24 A. Approximately 300.

25 Q. Okay. At Stillwater, do they just have one junior

1 A. No.

2 Q. Okay. So is the only school year that you had  
3 Mr. Morejon as a teacher, would that be your eighth  
4 grade year?

5 A. Yes.

6 Q. Okay. And I show, according to my timeline,  
7 Isabella -- and I want to make sure I'm right on  
8 this, that that would have been during the 2017-18  
9 school year. Does that sound right?

10 A. Yes.

11 Q. Okay. So when you first had Mr. Morejon as a  
12 teacher for history, what were your thoughts on him  
13 when you first kind of got in his classroom and were  
14 around him? Was he a good teacher? Bad teacher?  
15 As far as academically.

16 A. He was okay.

17 Q. Average?

18 A. Yeah.

19 Q. Okay. I'm not trying to put words in your mouth.  
20 I'm just asking.

21 A. No.

22 Q. Okay. Average teacher. Okay. Did you know --  
23 know him before you had him as a teacher? Had you  
24 ever met him before?

25 A. No.



1 Q. Okay. And obviously you had come from the middle  
2 school to the junior high?

3 A. Yes.

4 Q. Is that a different site?

5 A. Yes.

6 Q. In other words, it's not all in the same building?

7 A. Yes.

8 Q. So you wouldn't have been around him. You didn't  
9 know him from Adam --

10 A. No.

11 Q. -- correct?

12 A. Correct.

13 Q. Okay. So what I would like to do - it will help  
14 me, Isabella, and hopefully it will help you in  
15 moving forward, kind of walking through each year -  
16 is to divide up the school years by fall and spring;  
17 okay? Kind of like now, we're in the fall. Are you  
18 with me?

19 A. Uh-huh.

20 Q. Okay. So that way we don't commingle stuff.

21 In the fall of 2017 when you had Mr. Morejon  
22 as a teacher - so I'm just asking about the fall -  
23 is there anything that -- that he did or in any way  
24 that made -- that you felt was inappropriate in the  
25 fall of 2017?

1 A. Letting us sit behind his -- sit behind his desk --

2 Q. Okay.

3 A. -- was the first kind of thing that he did.

4 Q. Okay. So I didn't ask you about that. How was the  
5 classroom set up in his classroom?

6 A. So there was like the door to come in and then  
7 right across from that was his desk. And then he  
8 had a projection board on the same wall from where  
9 the door was and then all the seats.

10 Q. Were they desks or were they long --

11 A. They were desks. No, they --

12 Q. Individual?

13 A. Yeah.

14 Q. Could you move them around?

15 A. Yes.

16 Q. Okay. Because some classrooms they'll have like  
17 long tables.

18 A. Uh-huh.

19 Q. You've seen that, I'm sure.

20 A. Uh-huh.

21 Q. Okay. You know what? Just to help me understand  
22 what you're saying -- I don't know how your artwork  
23 is, Isabella, but I'm just going to have you, if you  
24 don't mind, just kind of draw the classroom, please.  
25 So you can make like a box and show me where the

1 Q. -- to allow kids to come and go?

2 A. Yes.

3 Q. All right. And you marked the desk area. Can you  
4 put an X where his chair would be in relationship to  
5 the desks?

6 A. (Witness complies.)

7 Q. Okay. So it would be on the opposite side of the  
8 desks away from the door; correct?

9 A. Yes.

10 Q. So if he was sitting at his desk, would he be  
11 facing the door?

12 A. Yes.

13 Q. Okay. And I know sometimes teachers will have  
14 desks where they face the students. Do you  
15 understand what I'm asking?

16 A. Uh-huh.

17 Q. In his classroom, you actually could see behind his  
18 desk if you were sitting in a chair on that last  
19 row; correct?

20 A. Yes.

21 Q. All right. Where was your seat in that classroom?

22 A. Right here.

23 Q. Can you put your initials by that desk?

24 A. (Witness complies.)

25 Q. Okay. Did your seat remain the same throughout the

1 entire school year or did you move around?

2 A. It stayed the same.

3 Q. And you said there was approximately around 20 to  
4 25 kids in the class that year; is that --

5 A. Yes.

6 Q. Okay. So you were telling me that in the fall of  
7 2017, to back up, that the first thing that you  
8 recall was Mr. Morejon letting -- you said "letting  
9 us sit behind his desk." Did I get that correct?

10 A. Yes.

11 Q. Okay. When you say "us," who are you referring to?

12 A. It was just me in my class, but I know he let other  
13 people sit back there in other classes.

14 Q. Okay. Can you put your -- can you please designate  
15 on your diagram on Exhibit 2 where you would have  
16 been sitting when you were behind his desk?

17 A. Do you want me to draw an X?

18 Q. No. You did an X for him, so let's go ahead and do  
19 your initials, please.

20 A. (Witness complies.)

21 Q. Okay. So were you -- was there another chair back  
22 there?

23 A. No.

24 Q. So how would you sit?

25 A. On the ground.

1 Q. Okay. So you would physically sit on the ground?

2 A. Uh-huh.

3 Q. All right. And what would be happening in the  
4 classroom, Isabella, that you would go from your  
5 desk in the classroom to over behind his desk and  
6 sit on the ground? How would that happen?

7 A. If he would do like a presentation or anything like  
8 that, he would go and sit back at his desk whenever  
9 we took notes, so I would go over there and take my  
10 notes.

11 Q. Okay. And when he would do a presentation - I  
12 wasn't in the class, so I don't know - would he be  
13 utilizing his SMART Board to put his presentation up  
14 on the SMART Board?

15 A. Yes.

16 Q. All right. So why were you -- how did it come that  
17 you would get up and go over here to watch the  
18 presentation? How would that happen? Would you  
19 just get up and walk over there? Would he ask you  
20 to come over there? How did that -- how did that  
21 happen?

22 A. Either one.

23 Q. All right. And you would sit on the ground and  
24 take notes?

25 A. Yes.

1 Q. All right. Do you recall any other students in the  
2 fall of 2017 in your class going over and sitting on  
3 the ground at any time during the class period?

4 A. No.

5 Q. All right. You told me just a minute ago that you  
6 knew other students sat on the ground behind his  
7 desk?

8 A. (Witness nods head up and down.)

9 Q. Tell me names of those students.

10 A. [REDACTED]. [REDACTED].

11 Q. [REDACTED] Is it -- can you help me with that,  
12 [REDACTED], how she spells it?

13 A. [REDACTED].

14 Q. [REDACTED].

15 A. Her last name, I do not know.

16 Q. Okay. [REDACTED]?

17 A. Yeah.

18 Q. Okay. Were these eighth graders at the time?

19 A. Yes.

20 Q. They would have been in your -- not in your  
21 physical class, but within the eighth grade class?

22 A. Yes.

23 Q. Okay. Anyone else?

24 A. No. Those are the main two that I knew.

25 Q. Okay. And when did you learn -- first learn that

1           ██████████, when you were in eighth grade, who  
2           was obviously not in your physical class -- in his  
3           class I mean with you, when did you find out she was  
4           sitting behind his desk?

5       A.   I'm not sure.

6       Q.   Was it that year?

7       A.   Yes.

8       Q.   Okay. And same question for ██████. Did you learn  
9           that that year?

10      A.   Yes.

11      Q.   That school year?

12                 were they friends of yours?

13      A.   No.

14      Q.   All right. Did someone tell you?

15      A.   I'm not sure.

16      Q.   Okay. Have you ever actually spoken to ██████ about  
17           this?

18      A.   Not about that subject, no.

19      Q.   That's what I'm trying to figure out, is how you  
20           learned it. That's what I'm trying to ask and I'm  
21           just not doing a very good job.

22      A.   Right.

23      Q.   How did you learn about this?

24      A.   I'm not sure.

25      Q.   Okay. Did you ever physically see it?

1 A. Not that year, but the next year, yes.

2 Q. Okay. So in your eighth grade year, you never saw  
3 either [REDACTED] or [REDACTED] sitting behind his desk?

4 A. Right.

5 Q. Okay. And I want to wait -- we'll get to next  
6 year. I just wanted to do eighth grade first. All  
7 right.

8 All right. So other than in the fall of 2017,  
9 was there anything else about sitting behind his  
10 desk that you haven't told me or have we covered it?

11 A. We covered it.

12 Q. All right. Had -- in the fall of 2017, had  
13 Mr. Morejon texted you or communicated with you  
14 outside of the school environment?

15 A. No.

16 Q. All right. Had anything else gone on between you  
17 and Mr. Morejon in the fall of 2017?

18 A. No.

19 Q. All right. Did you talk to any adults -- let's  
20 start with your mom, Heather Sneed. Did you talk  
21 with your mom in the fall of 2017 about you sitting  
22 behind his desk taking notes?

23 A. No.

24 Q. Okay. Any -- any other adults that you would  
25 talked to, whether it be at the school or outside of



1 the school, about the fall of 2017, sitting behind  
2 his desk?

3 A. No.

4 Q. All right. So let's move to the spring now of your  
5 eighth grade year. So now we're into '18. Are you  
6 with me --

7 A. Yes.

8 Q. -- on the timeline?

9 A. Yes.

10 Q. Okay. You're still in Mr. Morejon's history class?

11 A. Yes.

12 Q. It's a full year?

13 A. Yes.

14 Q. All right. Anything happen that spring that's  
15 different than what you've told me about in the  
16 fall?

17 A. He started messaging me after Christmas break, so  
18 that would have been the next year.

19 Q. So maybe sometime in January?

20 A. Yes.

21 Q. Okay. 2018?

22 A. Yes.

23 Q. All right. And when you say messaging, what --  
24 Isabella, what platform or method was he using to --  
25 to contact you?

1 A. Instagram.

2 Q. Instagram?

3 A. (Witness nods head up and down.)

4 Q. Okay. So do you know how Mr. Morejon got your  
5 Instagram information?

6 A. No.

7 Q. Did you give it to him?

8 A. No.

9 Q. Did he ask for it?

10 A. No.

11 Q. Okay. And I will tell you, I don't do that, so  
12 you're going to have to help me. Is this like a  
13 public platform that -- that anybody can go and --  
14 like let's just say you used your real name,  
15 Isabella Sneed. That someone could type in like  
16 Isabella Sneed, Oklahoma, and they could pull you  
17 up?

18 A. Yeah.

19 Q. Okay. So this is not something that someone has to  
20 have your information to find you?

21 A. No.

22 Q. When you were in eighth grade, did you go by your  
23 actual name, Isabella Sneed?

24 A. Yes.

25 Q. Okay. Not Bella?

1 A. No.

2 Q. It would have been Isabella?

3 A. Yeah.

4 Q. Okay. And would there have been a picture  
5 associated with that name so that if someone typed  
6 it in and looked you up they could see it and go,  
7 "Yeah, that's -- that's Isabella Sneed"?

8 A. Yes.

9 Q. Okay. So when you first received -- and does this  
10 work like text messages, where someone can just send  
11 you a message just to you or is this something that  
12 appears for the whole world to see? Do you  
13 understand what I'm asking?

14 A. Uh-huh. No, it's a private message.

15 Q. Private message. And what is that actually called  
16 through the Instagram platform? Do they have a  
17 specific name for that?

18 A. Direct message.

19 Q. Direct message.

20 A. Or DM.

21 Q. I'm sorry?

22 A. A DM.

23 Q. A DM. Okay. Is that how you first received  
24 contact in January of '18 from Mr. Morejon, that you  
25 got a "DM" from him?

1 A. Yes.

2 Q. Okay. And so when you got that, does it identify  
3 who is sending you that message?

4 A. Yes.

5 Q. And how was he identified? Does it have like their  
6 log-in name on there?

7 A. Yeah, like their -- their handle --

8 Q. Their handle?

9 A. -- you could call it.

10 Q. Okay. And do you remember what his handle was?

11 A. It was like albertomorejon and some numbers or  
12 something like that.

13 Q. But you could -- based on that identifying  
14 information, you knew who it was?

15 A. Yes. And it also had a picture.

16 Q. It had a picture of him?

17 A. Yes.

18 Q. Okay. So when he first reached out to you in  
19 January of '18, what was he saying to you initially?  
20 What -- how did he approach you?

21 A. I had posted a picture of my brother's dad. He has  
22 a pool table and it's the New York Yankees theme,  
23 and he had slid up on it and messaged me about it.  
24 What he said, I do not know.

25 Q. Okay. So he was just commenting on the pool table

1 or --

2 A. Yes.

3 Q. -- you?

4 A. No, the pool table.

5 Q. Okay. I haven't seen it, so I don't know what --  
6 what this is about.

7 okay. So when you got this message, do you  
8 have the opportunity as someone to respond?

9 A. Yes.

10 Q. Do you have the opportunity to delete?

11 A. Yes.

12 Q. Do you have the opportunity to block?

13 A. Yes.

14 Q. Okay. What did you -- what did you do when you got  
15 this message from Mr. Morejon?

16 A. Replied.

17 Q. Okay. Is that how the communication started --

18 A. Yes.

19 Q. -- outside of school was through that initial DM  
20 through Instagram?

21 A. Yes.

22 Q. Okay. Did that continue throughout the spring of  
23 2018?

24 A. Yes.

25 Q. And was it always through Instagram and through

1           this direct messaging feature on Instagram?

2       A.    Yes.

3       Q.    Okay.  would it go both ways?  Isabella, what I'm  
4           asking you, sometimes did you send him messages?  
5           Sometimes he would send you messages?  Basically you  
6           guys are chatting back and forth?

7       A.    Yes.

8       Q.    All right.  Did you tell your best friend [REDACTED]  
9           Shores about what was going on in the spring of 2018  
10          with Mr. Morejon?

11      A.    No.

12      Q.    Okay.  Did you tell your mom Heather?

13      A.    No.

14      Q.    Did you tell anyone?

15      A.    No.

16      Q.    Okay.  would your mother have had, Isabella, your  
17          log-in and password for Instagram when you were in  
18          eighth grade?

19      A.    No.

20      Q.    So your mom just couldn't pick up your phone when  
21          you were -- say you were, you know, doing something.  
22          She couldn't grab your phone and just look at it;  
23          right?

24      A.    She could, but she didn't, because I never gave her  
25          a reason to not trust me with it.

1 Q. Okay. But you said she could have?

2 A. Yes.

3 Q. If she didn't have the log-in, how could she have  
4 accessed your Instagram?

5 A. If it was on my phone, you didn't have to log in to  
6 it. It would have already been logged in.

7 Q. Okay. So it's a continuous -- you could just push  
8 the app and it would automatically open up?

9 A. Yes.

10 Q. Okay. Other than Instagram, when you were in  
11 eighth grade, was there any other social media apps  
12 you were using?

13 A. No.

14 Q. Is that the main one?

15 A. Uh-huh. Yes.

16 Q. I know I hear a lot -- from a lot of young people  
17 that Facebook isn't cool anymore; it's for the old  
18 folks. Do you do Facebook?

19 A. I do now.

20 Q. You do now. Okay. Well, welcome to the club. No,  
21 I don't do Facebook.

22 Do you still do Instagram?

23 A. Yes.

24 Q. Okay. So Instagram, Facebook. Anything else that  
25 you use?

1 A. Snapchat.

2 Q. Snapchat. I know there's a lot out there, like  
3 TikTok maybe?

4 A. Yeah, TikTok.

5 Q. TikTok. Okay. Is that similar to these other  
6 platforms where you can communicate with people?

7 A. Yes.

8 Q. Okay. Any others?

9 A. No.

10 Q. Okay. Which one is your favorite?

11 A. Facebook.

12 Q. Facebook is your favorite?

13 A. Yes.

14 Q. All right. So backing up to the spring of '18.  
15 You've got this direct messaging going on between  
16 you and Mr. Morejon. Are you still taking notes  
17 behind his desk?

18 A. Yes.

19 Q. So when he does a presentation?

20 A. (Witness nods head up and down.)

21 Q. Would that be every single class period or just  
22 some?

23 A. Most.

24 Q. Most. Okay. Anything else happen in the spring of  
25 '18 with Mr. Morejon that we have not discussed?



1 A. No.

2 Q. All right. So before I move off the spring, I just  
3 want to ask: In your communications on Instagram  
4 with Mr. Morejon, was there anything that went on by  
5 way of him sending to you or you sending to him that  
6 you would say was inappropriate? What I mean by  
7 that is of a sexual nature in the spring of '18.

8 A. Yes, but it wasn't pictures. It was just him  
9 saying things.

10 Q. Okay. Can you help me out? Like what -- what kind  
11 of things?

12 A. He would want to meet up with me and just -- he  
13 always fantasized things.

14 Q. Okay. So he would try to meet you in the spring of  
15 '18?

16 A. Yes.

17 Q. And you were 14 years old. Obviously you weren't  
18 driving.

19 A. Right.

20 Q. So how was he proposing that you guys meet up?

21 A. Couldn't tell you.

22 Q. So there were no details? It was just a generic  
23 statement?

24 A. It was just like fantasizing it.

25 Q. Oh, okay. So not really trying to meet up, just

1 talking about if you-all met up?

2 A. Yes, but --

3 Q. Okay.

4 A. -- trying to meet up at the same time --

5 Q. Okay. All right.

6 A. -- even though I could not drive.

7 Q. Okay. Did he actually get into details with you,  
8 Isabella, about what he -- what he wanted to happen  
9 when you-all met up?

10 A. Not then, I don't think, but it's pretty obvious.

11 Q. Okay.

12 MR. BLAKEMORE: John, we've been going about  
13 an hour. Can we take like a maybe five-minute  
14 break?

15 MR. PRIDDY: Sure. Absolutely.

16 THE VIDEOGRAPHER: Off the record.

17 (Whereupon, a break was taken.)

18 THE VIDEOGRAPHER: Back on the record. Go  
19 ahead.

20 Q. (By Mr. Priddy) Isabella, I always ask people  
21 after a break if they want to add or change any of  
22 their previous answers.

23 A. No.

24 Q. Okay. So I think we were trying to wrap up the  
25 spring of 2018 of your eighth grade year in

1 Mr. Morejon's class. So we've talked about sitting  
2 behind his desk taking notes.

3 A. Yes.

4 Q. Talked about him doing the direct messaging. Is  
5 there anything else that went on that we have not  
6 discussed?

7 A. No.

8 Q. Okay. We've covered it all?

9 A. (Witness nods head up and down.)

10 Q. Okay. And just so I'm clear, had he -- he had  
11 not -- he flirted -- or I don't want to use that  
12 term, but he had talked about fantasizing about  
13 meeting with you; correct?

14 A. Yes.

15 Q. Okay. And -- but he hadn't sent any pictures at  
16 that time?

17 A. No.

18 Q. Had he asked you to send any pictures at that time?

19 A. Yes.

20 Q. Had you sent any pictures?

21 A. No.

22 Q. All right. And as far as what was going on between  
23 you and Mr. Morejon, you hadn't told anybody?

24 A. No.

25 Q. Okay. Did you sometimes go behind his desk and

1 sleep?

2 A. Yes.

3 Q. Okay. So you weren't always just taking notes?

4 A. No.

5 Q. You would actually sleep back there?

6 A. Yes.

7 Q. Okay. And when you were in his class, did you --  
8 was there parts of the school year where you weren't  
9 turning in your work?

10 A. Yes.

11 Q. And was he submitting grades for you --

12 A. Yes.

13 Q. -- even though you didn't turn in your work?

14 A. Yes.

15 Q. Okay. Did you tell anyone about that?

16 A. No.

17 Q. Okay. And as far as the '17-18 school year, you  
18 didn't actually see anybody else being behind his  
19 desk or any direct messaging with any other girls,  
20 anything like that?

21 A. No.

22 Q. Okay. As far as you knew that year, you were the  
23 only one?

24 A. No. I knew that they were sitting back there. I  
25 had never physically seen it.

1 Q. Okay. So you knew that that year. And I'm sorry,  
2 I misunderstood that. So [REDACTED] and [REDACTED] [sic], you  
3 knew they were sitting back there; you just didn't  
4 see it?

5 A. Right.

6 Q. Okay. Did you ever have any conversations that  
7 school year with any Stillwater School District  
8 employees about Mr. Morejon and any of his conduct?

9 A. No.

10 Q. Okay. Did anyone approach you and try to talk to  
11 you that was an employee with Stillwater about  
12 anything that was going on between you and  
13 Mr. Morejon?

14 A. No.

15 Q. Okay. Did -- did he tell you to keep things a  
16 secret?

17 A. Yes.

18 Q. Okay. So the summer between your eighth and ninth  
19 grade year, Isabella, did you have any contact with  
20 Mr. Morejon during the summer months?

21 A. Yes.

22 Q. Okay. How would you have contact with him during  
23 the summer between eighth and ninth grade year?

24 A. The same. Instagram.

25 Q. The DM --

1 A. Yes.

2 Q. -- platform?

3 A. Yes.

4 Q. Okay. And I've never done that, but is that like a  
5 text where like you could go back later and pull up,  
6 or is it like Snapchat where it disappears?

7 A. Both.

8 Q. It does both?

9 A. Uh-huh.

10 Q. How does that work? Can you explain that to me?

11 A. So if you just type out a message and send it, it's  
12 going to stay there. But they have pictures where  
13 it's like Snapchat where you can take a picture and  
14 then write a text on it and it disappears after you  
15 open it.

16 Q. So you can actually type a -- some type of a  
17 message on the actual photograph?

18 A. Yes.

19 Q. Okay. Like let's just say you took a picture of a  
20 dog. You can say, "This is my dog Jetta," and then  
21 you can send it and you can designate that for, when  
22 the person opens it, they can see it but then it  
23 will disappear?

24 A. Yes.

25 Q. Can you set a time limit on that or is it already

1 preprogrammed, like 30 seconds or a minute or  
2 whatever?

3 A. It -- it's there until you click off of it and then  
4 it's gone.

5 Q. So as soon as you stop looking at it, it  
6 automatically then goes away?

7 A. Right.

8 Q. Okay. So let me back up, because I didn't  
9 understand that. These messages that you-all were  
10 doing in the spring, were those all disappearing  
11 messages or would those have been messages that  
12 would have stayed on the phone?

13 A. Not all of them disappeared. Some of them did stay  
14 on the phone.

15 Q. Okay. So in your eighth grade year, is the only  
16 time you were physically around Mr. Morejon would  
17 have been during the -- during school hours?

18 A. Yes.

19 Q. Never met him out alone privately?

20 A. No.

21 Q. Okay. So the summer of 2018 before you start your  
22 ninth grade year, you're continuing to send these --  
23 you guys are continuing to interact through the DM  
24 platform on Instagram; correct?

25 A. Yes.

1 Q. Any other ways in which you-all would communicate?

2 A. No.

3 Q. No phone calls, like old-fashioned call somebody up  
4 and talk to them?

5 A. No.

6 Q. Okay. In the summer did things change or were they  
7 different than what you told me in the spring as far  
8 as the type of communications?

9 A. No.

10 Q. Same stuff?

11 A. (Witness nods head up and down.)

12 Q. Was it always talking about meeting up or would  
13 sometimes you guys just talk about normal things  
14 like, "what's going on?" "How are you?" Stuff like  
15 that?

16 A. Yes.

17 Q. Okay.

18 A. It was -- yeah.

19 Q. Normal life stuff?

20 A. Yes.

21 Q. Okay. At that time when you were in the eighth  
22 grade and into the summer, did you know if  
23 Mr. Morejon was married or single or had a  
24 girlfriend?

25 A. He was married.



1 Q. Okay. So in your eighth grade year, you knew he  
2 had a wife --

3 A. Right.

4 Q. -- correct?

5 A. Yeah.

6 Q. All right. Did you know if he had any children?

7 A. Yes. He didn't.

8 Q. He did not?

9 A. No.

10 Q. Okay. At some point in this communicating with  
11 Mr. Morejon, did you learn that his wife was  
12 pregnant?

13 A. Not in the summer of eighth grade.

14 Q. Okay. So at that point where we're at right now,  
15 you knew nothing about her being pregnant; is that  
16 fair?

17 A. Right. Yes.

18 Q. Okay. So during the summer months of your eighth  
19 to ninth grade year, did he try to send you any  
20 inappropriate pictures?

21 A. Yes.

22 Q. Okay. So that's when the pictures started?

23 A. Yes, in the summer.

24 Q. Okay. And Isabella, not -- I don't want to, you  
25 know, belabor this, so I'm going to try to get off

1 of it pretty fast, but would these be pictures of  
2 his body parts?

3 A. Yes.

4 Q. Okay. And so Mr. Morejon just starts sending you,  
5 through DM, photos that he has taken of his anatomy?

6 A. Yes.

7 Q. Without his clothes on?

8 A. Yes.

9 Q. All right.

10 A. Not all of them were without his clothes on, but  
11 yes.

12 Q. Some were?

13 A. Yes.

14 Q. Okay. And would that be his private area that he  
15 was sending?

16 A. Yeah.

17 Q. Okay. And would these be pictures that would  
18 disappear like we talked about, once you've seen  
19 them, you got out of it, it would be gone?

20 A. Yes.

21 Q. Okay. And did he try to solicit from you  
22 reciprocal photographs of you?

23 A. Yes.

24 Q. Did you send him any photographs that summer  
25 between your eighth and ninth grade year?

1 A. No.

2 Q. All right. So you always declined that request by  
3 him?

4 A. Yes.

5 Q. Okay. In the summer months, I know a lot of  
6 schools have like training programs for like sports.  
7 Like volleyball, they'll have conditioning, and some  
8 extracurricular activities are year-round.

9 In the summer between your eighth and ninth  
10 grade year, did you have any interactions with any  
11 school activities, that being either volleyball  
12 training or FFA duties or anything like that?

13 A. volleyball, yes.

14 Q. Okay. And I know I keep telling you I'm going to  
15 get off your eighth grade year, but I do have one  
16 last question. Did you have a favorite teacher your  
17 eighth grade year?

18 A. Him.

19 Q. He was your favorite teacher?

20 A. Yes.

21 Q. Okay. So the summer between eighth and ninth  
22 grade, you said you-all had volleyball training;  
23 correct?

24 A. Yes.

25 Q. So would you-all meet as a team with your coach and

1 do specific workouts?

2 A. Yes.

3 Q. All right. Did you share with any adult - let's  
4 start with your mom in the summer months between  
5 eighth and ninth grade, so that would be the summer  
6 of '18 - that Mr. Morejon was sending you  
7 inappropriate messages, including photos of his  
8 private area that summer?

9 A. No.

10 Q. Did you tell your mom?

11 A. No.

12 Q. Did you tell your best friend?

13 A. No.

14 Q. Did you tell anyone?

15 A. No.

16 Q. Okay. So you were still keeping this a secret?

17 A. Right.

18 Q. Okay. Anything else happen that summer before we  
19 move on to ninth grade that we have not discussed  
20 between you and Mr. Morejon?

21 A. No.

22 Q. You never met him --

23 A. No.

24 Q. -- alone?

25 A. No.

1 A. Right. So June -- June or July --

2 Q. Okay.

3 A. -- to March.

4 Q. Okay. Fall volleyball and spring volleyball?

5 A. Yes.

6 Q. Okay. What position did you play? Were you a  
7 setter? Were you a hitter? What were you?

8 A. I was left-side hitter and then a DS.

9 Q. And I didn't notice when you walked in. How tall  
10 are you, Isabella?

11 A. Like five-six.

12 Q. Okay. And back when you were in junior high, were  
13 you -- had you grown to the height you are now?

14 A. Yes.

15 Q. Okay. So you were pretty tall for an eighth and  
16 ninth grader; correct?

17 A. Yes.

18 Q. Is that why you were a hitter?

19 A. Yeah.

20 Q. Okay.

21 Okay. So in the summer you got the  
22 communication going on. You haven't told anybody.  
23 School starts in the fall, now ninth grade. You're  
24 not in his class; correct?

25 A. Correct.

1 Q. Would you be around Mr. Morejon at school in your  
2 ninth grade year?

3 A. Yes.

4 Q. How would you be around him?

5 A. Lunch --

6 Q. Okay.

7 A. -- and after school.

8 Q. All right. So --

9 A. And --

10 Q. Go ahead. I'm sorry.

11 A. Occasionally he would call me into his room,  
12 because he had a planning period.

13 Q. Okay. So let's start with lunch. When you were in  
14 junior high, would that be a lunch period for both  
15 grades combined or would they do each grade  
16 separately?

17 A. It was each grade separately.

18 Q. All right. So in ninth grade, you get -- the ninth  
19 grade would have a designated lunch hour?

20 A. Right.

21 Q. And at some other point in time of the day eighth  
22 grade would have a lunch hour?

23 A. Right.

24 Q. Okay. Was he still teaching eighth grade when you  
25 were in the ninth grade?

1 A. Yes.

2 Q. Okay. So when you had your lunch hour, was he not  
3 teaching class?

4 A. Yes.

5 Q. He was teaching class?

6 A. (Witness nods head up and down.)

7 Q. Okay. So there would be students in there?

8 A. Yes.

9 Q. Okay. And then you said you would sometimes see  
10 him after school?

11 A. Yes.

12 Q. Would you go by his room after school? Is that how  
13 you would see him?

14 A. Yes.

15 Q. All right. Did you have FFA or volleyball  
16 obligations after school?

17 A. Not in junior high.

18 Q. Okay. So as far as volleyball or FFA  
19 responsibilities, that would not be after school in  
20 junior high?

21 A. Right. We would only have it like three times a  
22 week, I think.

23 Q. Okay.

24 A. For volleyball.

25 Q. But would that be after school?

1 A. He would be in his classroom.

2 Q. Okay. would he be back behind his desk?

3 A. Yes.

4 Q. All right. And you would walk in after the school  
5 day was over and what? what was going on in there?  
6 Just talking?

7 A. Uh-huh.

8 Q. Okay. Anything inappropriate go on in that  
9 classroom of a sexual nature?

10 A. At this time?

11 Q. Yeah, in the fall of 2018.

12 A. That's when he started touching my legs.

13 Q. Okay.

14 A. But other than that, no.

15 Q. Okay. well, we haven't talked about that, so let  
16 me ask you about that. So when -- when during the  
17 school day would this touching occur? was it always  
18 the same part of the school day or different points  
19 throughout the day?

20 A. Usually the same after school because there was  
21 nobody in there.

22 Q. Okay. So after school you would go by to see him  
23 and he would touch your legs?

24 A. Right.

25 Q. Okay. Can you explain to me how that would occur?



1           would you go over behind the desk? would you be --

2   A.   Yes.

3   Q.   -- sitting on the desk?

4   A.   No.

5   Q.   Where were you in the classroom?

6   A.   Sitting behind the desk.

7   Q.   On the floor?

8   A.   Yes.

9   Q.   Okay. So you would come in after school, you would  
10       go around behind his desk, and you would sit down on  
11       the floor?

12  A.   Right.

13  Q.   And that -- he would then touch your legs?

14  A.   Right.

15  Q.   Okay. Was it on the outside or the inside of your  
16       clothes?

17  A.   Outside.

18  Q.   All right. And would he pat you, squeeze you, rub  
19       you, or just set his hand on your leg? What -- what  
20       was the motion like?

21  A.   All three.

22  Q.   All three. Okay. Would he say anything when he  
23       was doing this?

24  A.   No, just normal talking.

25  Q.   Okay. So sometimes he would pat your leg?

1 A. Right.

2 Q. Sometimes he would squeeze your leg?

3 A. Right.

4 Q. And sometimes he would rub his hand on your leg?

5 A. Right.

6 Q. Okay. Did he ever say anything inappropriate when  
7 he was doing that?

8 A. No.

9 Q. Okay. To your knowledge, did anyone, that you were  
10 aware of, observe Mr. Morejon touching your leg?

11 A. No.

12 Q. Okay. Did you tell anyone in the fall of 2018 that  
13 Mr. Morejon touched your leg?

14 A. No.

15 Q. And Isabella, there's obviously different parts of  
16 our leg, you know, calf, knee, thigh area. Where on  
17 your leg was he touching you?

18 A. My thighs.

19 Q. Your thighs? Okay. Both thighs?

20 A. (Witness nods head up and down.)

21 Q. Okay. On top? On the sides?

22 A. Like inside and then --

23 Q. Inside your thigh?

24 A. -- on top.

25 Q. Okay. Anything else that happened - you said when

1       you went in there after school - other than what  
2       you've told me?

3     A.   No.

4     Q.   All right. And it sounds like from the time you  
5       were let out of school to the time your mom picks  
6       you up, you have approximately 20 minutes total?

7     A.   Right.

8     Q.   And you've clearly got some walking to do to get  
9       from different locations, so if you can just give me  
10      an idea about how much time you were in his room.  
11      Was it around ten minutes?

12    A.   Yeah, ten, fifteen minutes.

13    Q.   Okay. Did you tell anyone in the fall, your best  
14      friend or anybody, about him doing any of these  
15      things in the fall?

16    A.   No.

17    Q.   Okay. Anything else happen in his classroom in the  
18      fall of 2018 between you and Mr. Morejon other than  
19      what you've told me?

20    A.   No.

21    Q.   Any -- you-all are still communicating through DM?

22    A.   Yes.

23    Q.   Is it the same -- same things that were happening  
24      during the summer as far as some fantasizing of  
25      meeting you and sending inappropriate pictures?

1 A. Yes.

2 Q. Is that continuing in the fall?

3 A. (Witness nods head up and down.)

4 Q. And did -- in the fall, did you send him any  
5 pictures?

6 A. No.

7 Q. Okay. So in the fall of '18 when you're a ninth  
8 grader, did you know about him sending any pictures  
9 to any other students?

10 A. No.

11 Q. Okay. In your -- fall of 2018, your ninth grade  
12 year, did you know about any other girls that he was  
13 patting on the leg?

14 A. No.

15 Q. Okay. That he was acting in any way inappropriate  
16 with?

17 A. No.

18 Q. Okay. Are you aware if anyone saw Mr. Morejon  
19 touching your leg?

20 A. No.

21 Q. Did you see anybody in there that could have seen  
22 this?

23 A. No.

24 Q. Okay. Is there anything else that happened in the  
25 fall with Mr. Morejon that we have not discussed in

1 your ninth grade year of 2018?

2 A. No.

3 Q. You never met him alone?

4 A. (Witness shakes head back and forth.)

5 Q. Okay. Let's move on then, Isabella, please, to the  
6 spring of your ninth grade year. So now we're into  
7 2019. Are you with me?

8 A. Yes.

9 Q. Okay. You're still in Stillwater Public Schools?

10 A. (Witness nods head up and down.)

11 Q. You're at the junior high?

12 A. (Witness nods head up and down.)

13 Q. Did you have a favorite teacher that year, your  
14 ninth grade year?

15 A. Him and Ms. Crow.

16 Q. And I haven't heard that name. Who is Ms. Crow?

17 A. She was my English teacher.

18 Q. Your ninth grade English teacher?

19 A. Yes.

20 Q. Okay. So in the spring now of your ninth grade  
21 year, does it go similar to your fall semester in  
22 that you were going by there after school?

23 A. Yes.

24 Q. Same type of conduct going on, you're sitting  
25 behind the desk and he is reaching down and touching

1       your leg?

2       A.    Yes.

3       Q.    Does he touch any other part of your body other  
4       than your leg in the spring of 2019?

5       A.    No.

6       Q.    All right. Is he continuing to communicate with  
7       you through Instagram and direct messaging?

8       A.    Yes.

9       Q.    Is he continuing to send inappropriate pictures?

10      A.    Yes.

11      Q.    Is he continuing to ask you to send him pictures?

12      A.    Yes.

13      Q.    And did you do that in the spring?

14      A.    No.

15      Q.    Okay. Anything else go on with Mr. Morejon in the  
16      spring of 2019 that is different or -- in any way  
17      than what we've -- you've previously told me about  
18      or is it basically the same type of stuff that went  
19      on in the fall?

20      A.    It was the same.

21      Q.    Okay. Did you tell anyone in the spring about what  
22      was going on between you and Mr. Morejon?

23      A.    No.

24      Q.    Your mom?

25      A.    No.

1 Q. Your best friend?

2 A. No.

3 Q. Anybody at the school?

4 A. No.

5 Q. Okay. You still -- you -- you haven't met him  
6 alone?

7 A. Right.

8 Q. And the only --

9 MR. BLAKEMORE: Other than in the classroom?

10 MR. PRIDDY: I'm sorry?

11 MR. BLAKEMORE: Other than in the classroom?

12 MR. PRIDDY: Right. I wasn't done with the  
13 question, but thank you, Bob.

14 MR. BLAKEMORE: Okay.

15 Q. (By Mr. Priddy) You hadn't met him alone outside  
16 of school is what I'm --

17 A. No.

18 Q. Yeah. And the only time you met him alone at  
19 school was after school; right?

20 A. Right.

21 Q. Okay.

22 All right. So now we're going to go to summer  
23 of -- between your ninth and tenth grade year, so  
24 we're in the summer of 2019. Are you still doing  
25 volleyball?

1 A. Yes.

2 Q. Still have the training program we talked about  
3 between your eighth and ninth grade year?

4 A. (Witness nods head up and down.)

5 Q. FFA. I know you said you got rid of the animals in  
6 April, so you don't have any FFA duties during the  
7 summer; correct?

8 A. Yes.

9 Q. All right. Did you work between your ninth and  
10 tenth grade year?

11 A. No.

12 Q. So you're just a kid enjoying the summer?

13 A. Yes.

14 Q. Doing summer stuff?

15 A. (Witness nods head up and down.)

16 Q. Okay. And would you have had any reason to be up  
17 at the school during the summer other than maybe  
18 volleyball workouts?

19 A. No.

20 Q. Okay. Did -- did -- during the summer, did you  
21 have communication with Mr. Morejon between your  
22 ninth and tenth grade year?

23 A. Yes.

24 Q. And that involved the Instagram DM?

25 A. Yes.



1 Q. Was that the only way you guys ever communicated,  
2 Isabella, so I can just kind of make sure that's it?

3 A. Yes.

4 Q. Okay. And you never physically went and met him  
5 alone outside of school, just so I can make sure I'm  
6 clear on that?

7 A. Right.

8 Q. Is that correct?

9 A. Yes.

10 Q. Okay. So the only time you would have ever been  
11 alone with Mr. Morejon would have been when you went  
12 and saw him after school in his class?

13 A. Right.

14 Q. All right. So in the summer between ninth and  
15 tenth grade, he is doing the exact same stuff. He  
16 is sending you these messages, he is telling you  
17 about his -- his fantasies, and he is sending you  
18 inappropriate pictures; correct?

19 A. Right.

20 Q. All right. Anything else happen in the summer that  
21 we have not talked about between you and  
22 Mr. Morejon?

23 A. No.

24 Q. Okay. Did you tell your mom about any of this  
25 during the summer of 2019?

1 A. No.

2 Q. Tell any of your friends?

3 A. No.

4 Q. Tell anybody with Stillwater Public Schools?

5 A. No.

6 Q. Okay. You were keeping it a secret?

7 A. (Witness nods head up and down.)

8 Q. Okay. Did you -- when did you learn that his wife  
9 became pregnant? Would it have been that summer?

10 A. The fall of that year.

11 Q. Your tenth grade year?

12 A. Yes.

13 Q. Okay. So now when we go to -- moving on to your  
14 tenth grade year. Now you're going to leave the  
15 high -- junior high and you're going to go to the  
16 high school building; correct?

17 A. Yes.

18 Q. Is that at a different site?

19 A. Yes.

20 Q. Is the junior high and the high school close enough  
21 in proximity that you could walk over and --

22 A. No.

23 Q. Okay. They're too far away?

24 A. (Witness nods head up and down.)

25 Q. All right. And so you would have been 16 years old

1       your -- your tenth grade year?

2       A.   Yes.

3       Q.   Were you driving at that time?

4       A.   I didn't start driving until February, so no.

5       Q.   No.   Okay.

6                would you have had any physical contact with  
7       Mr. Morejon when you were in the fall of 2019?  And  
8       what I mean by that, come in -- not necessarily  
9       touching you, but being around him physically.  
10      would there have been any reason, since you were at  
11      a different site, for you guys to be around each  
12      other?

13      A.   No.

14      Q.   All right.  So in the fall of 2019, do you ever  
15      remember physically seeing him, being in the same  
16      location that he was?

17      A.   No.

18      Q.   Okay.  So all of your communication with him in the  
19      fall of 2019 would have been through the Instagram  
20      app, through this DM process?

21      A.   Yes.

22      Q.   All right.  Same thing going on that you previously  
23      told me about:  The inappropriate pictures, the  
24      trying to get you to meet him and -- or at least the  
25      fantasizing about it?

1 A. Yes.

2 Q. Okay. In the fall of 2019, your tenth grade year,  
3 did you tell anyone about this? Did you tell your  
4 mom?

5 A. No.

6 Q. Did you tell any of your friends?

7 A. No.

8 Q. Did you tell anyone with the school?

9 A. No.

10 Q. Okay. Keeping it a secret?

11 A. Right.

12 Q. Okay. So in the -- your tenth grade year, were you  
13 playing volleyball?

14 A. Yes.

15 Q. At the high school level?

16 A. Yes.

17 Q. Is that when Kyle became your new coach?

18 A. Yes.

19 Q. Okay. would you-all -- was the requirements for  
20 high school volleyball, were they different than  
21 junior high volleyball? What I mean by that,  
22 Isabella, the commitment of the players. In other  
23 words, did you-all practice more frequently? Did  
24 you practice longer? Can you give me some idea?

25 A. Yes. We practiced every day for three hours, I

1 believe.

2 Q. would that be before or after school?

3 A. After school.

4 Q. So from what, 4:15 -- you said school got out at  
5 4:00; correct?

6 A. Yes.

7 Q. So from 4:15 to 7:15?

8 A. Yes.

9 Q. Okay. And I think you told me earlier that there  
10 was a junior varsity and a varsity team?

11 A. Yes.

12 Q. So when you were in the tenth grade, would you have  
13 been on varsity or junior varsity?

14 A. Junior varsity.

15 Q. Do you remember how big your team was, the JV team?  
16 Like how many -- approximately how many girls would  
17 have been on the team? Was it ten to fifteen or how  
18 big was it?

19 A. Probably ten to fifteen.

20 Q. Ten to fifteen. Okay. Were you still playing  
21 outside hitter?

22 A. Yes.

23 Q. Right side? Left side?

24 A. Left side.

25 Q. Left side. Are you right-handed or left-handed?

1 A. Right-handed.

2 Q. Okay. Do you remember -- strike that.

3 Did you play volleyball also in eleventh  
4 grade, the next school year? Or was tenth grade  
5 your last year?

6 A. I played in eleventh.

7 Q. Okay. So in your tenth grade year, we talked about  
8 the spring. The same type of stuff is going on as  
9 far as the messaging, but no -- not being -- you  
10 were not around Mr. Morejon because you were at a  
11 different site. Anything else happen in the fall of  
12 2019, the start of your tenth grade year, with  
13 Mr. Morejon that we have not discussed?

14 A. No.

15 Q. Okay. So the spring of 2020 gets kind of  
16 interesting for all of us, Isabella. Do you  
17 remember that?

18 A. Yes.

19 Q. COVID hits?

20 A. (Witness nods head up and down.)

21 Q. Okay. So it kind of really makes this timeline a  
22 little messed up, so I want to make sure we separate  
23 kind of pre-COVID versus when COVID hits; okay?

24 A. (Witness nods head up and down.)

25 Q. So we start off in the spring of 2020. We got

1 January and February that the world still is kind of  
2 normal at that point.

3 A. (Witness nods head up and down.)

4 Q. So you're back for your tenth grade year at  
5 Stillwater at the high school; correct?

6 A. Yes.

7 Q. All right. And as far as your communication with  
8 Mr. Morejon at that point, is it all still through  
9 Instagram, the -- the DM platform?

10 A. Yes.

11 Q. Okay. You're physically not around him because  
12 you're at a different site?

13 A. Right.

14 Q. All right. Is he still doing the same type of  
15 conduct that we've previously discussed, that being  
16 sending messages with his fantasies and also sending  
17 inappropriate pictures?

18 A. Yes.

19 Q. Okay. While school is still actively in session -  
20 what I mean by that, you're physically going to the  
21 schools, you know, we're not at home - did you tell  
22 anyone at -- anybody about what's going on that  
23 January/February time period of 2020, that being  
24 either your mom -- did you tell her about what was  
25 going on with Mr. Morejon?

1 A. No.

2 Q. Any of your friends?

3 A. No.

4 Q. Is Miss Shores still your best friend at that time?

5 A. Yes.

6 Q. Okay. And then what about anybody at the school?

7 Had you told anybody at the school at that point in  
8 time?

9 A. No.

10 Q. Okay. And then COVID hits around late  
11 February/early March and everything shuts down. Do  
12 you remember that?

13 A. Yes.

14 Q. And at that time, the school transitions, kind of  
15 like the world does, to this distant learning  
16 format.

17 A. (Witness nods head up and down.)

18 Q. Do you remember that?

19 A. Yes.

20 Q. Okay. Do you and Mr. Morejon continue to  
21 communicate through that spring semester through  
22 this Instagram DM process?

23 A. Yes.

24 Q. Did that change at all or did it continue whether  
25 there was COVID or no COVID?



1 A. It continued.

2 Q. All right. So I would like to just take you up to  
3 what would have been the normal end of the school  
4 year, May of 2020. He is continuing to send you the  
5 DMs, inappropriate comments, and pictures; correct?

6 A. Yes.

7 Q. Do you tell anybody the remaining months of that  
8 year -- and -- and I want to stop before we get to  
9 your report to the police in May; okay?

10 So I show on May 12th is when the police got  
11 involved. Is that your memory?

12 A. Yes.

13 Q. Okay. So prior -- I want to stop there. Prior to  
14 May 12th, had you told your mom about what was going  
15 on?

16 A. No.

17 Q. All right. Had your told your best friend about  
18 what's going on?

19 A. No.

20 Q. Had you told anyone about --

21 A. No.

22 Q. All right. So how on May 12th -- help me  
23 understand, Isabella. How does it come to light on  
24 May 12th of 2020 about this communication that  
25 you're having with Mr. Morejon through Instagram?

1 A. My boyfriend at the time had saw that he had  
2 messaged me and he told me I needed to tell my mom.  
3 And I didn't understand why, but I did, and she  
4 called the police that night, and that was that.

5 Q. So prior to him -- did he actually see the message  
6 on the 12th?

7 A. Yes.

8 Q. The day the police found out?

9 A. Yes.

10 Q. Okay. So I know like a lot of people -- like on my  
11 phone, when I get a text, it will at least show --  
12 it may not show the whole text, but there will be  
13 something pop up.

14 A. (Witness nods head up and down.)

15 Q. Is that what happens on that Instagram DM, that  
16 your -- if your phone is sitting there, that it  
17 would show you got a message from someone but it may  
18 not show the content?

19 A. Yes.

20 Q. Is that what your boyfriend saw?

21 A. Yes.

22 Q. And is he still your boyfriend?

23 A. No.

24 Q. Okay. What was your boyfriend's name in May of  
25 2020?

- 1 A. Sam Crawford.
- 2 Q. Sam -- last name again?
- 3 A. Crawford, C-r-a-w-f-o-r-d.
- 4 Q. Was he in your grade?
- 5 A. No, he was a grade above me.
- 6 Q. Okay. So when you were in tenth, he would have
- 7 been an eleventh grader?
- 8 A. Yes.
- 9 Q. At Stillwater?
- 10 A. Yes.
- 11 Q. Okay. Has he graduated?
- 12 A. Yes.
- 13 Q. Do you know where Sam is in today's world? Do you
- 14 have any contact with him?
- 15 A. No.
- 16 Q. Okay. So Sam sees this message from -- does it say
- 17 Alberto Morejon on -- does he know who he is?
- 18 A. Yes.
- 19 Q. So he is like, "why is this teacher messaging you"?
- 20 A. Yes.
- 21 Q. And what do you tell Sam when he first asked you
- 22 about it?
- 23 A. I didn't really tell him anything.
- 24 Q. So you didn't give him the details is what I'm --
- 25 A. No.

1 Q. -- getting at about what's been going on?

2 A. No.

3 Q. Okay. But Sam encourages you to tell your mom?

4 A. Yes.

5 Q. And is your mom at home when this happens?

6 A. Yes.

7 Q. Where are you physically when this -- when you get  
8 this message? Were you at your house? Were you at  
9 a business? Were you at Sam's house? Where were  
10 you?

11 A. We -- he was dropping me off at my house and we  
12 were in the truck and I was to go in to my house.

13 Q. Okay. Does he ask to look at your phone and see  
14 the message?

15 A. Yes.

16 Q. Did he look at the message?

17 A. No.

18 Q. Okay. You wouldn't let him look?

19 A. No.

20 Q. Okay. And then do you go straight in the house --  
21 is your mom home?

22 A. Yes.

23 Q. Do you go straight in and tell her?

24 A. No.

25 Q. Okay. Did Sam go in with you or did he leave?

1 A. No, he left.

2 Q. All right. So you go in the house. And what  
3 happens, Isabella, for you to decide to finally  
4 share with your mom what's -- that this teacher has  
5 been messaging you?

6 A. I took a shower and just felt -- I don't know what  
7 the word would be, but like I needed to tell her.  
8 So I yelled at her to come in there and she did and  
9 I told her, and that was that.

10 Q. So when you told your mom -- obviously you guys  
11 have had a lot of communication over several years;  
12 right?

13 A. (Witness nods head up and down.)

14 Q. Did you open up your phone? Did you let your mom  
15 read all this stuff? Did you just kind of give her  
16 a snippet of information? Can you kind of elaborate  
17 on what you told her, how that -- how that went  
18 down?

19 A. I told her that he had been messaging me for, what,  
20 two years now and that it was inappropriate matter.

21 Q. Okay. And did your mom immediately call the  
22 police? What happened next?

23 A. She called one of her friends that works in Tulsa  
24 as a police officer and asked him what she should  
25 do.

1 Q. Okay.

2 A. And then she called the Stillwater Police  
3 Department.

4 Q. And did they have you come down to the police  
5 station?

6 A. They came to my house.

7 Q. Okay. Did they look at your phone?

8 A. No.

9 Q. They did not?

10 A. No, not -- not that day.

11 Q. Okay. So did they just send out an officer who  
12 spoke with you?

13 A. (Witness nods head up and down.)

14 Q. Did you share the same information with the officer  
15 that you told your mom?

16 A. Yes.

17 Q. All right. And then the next day, is that when you  
18 went down to the police department?

19 A. Yes.

20 Q. Okay. Some people refer to when you try to catch  
21 someone that's breaking the law and you try to kind  
22 of bait them into doing something inappropriate so  
23 you can catch them red-handed as kind of a sting  
24 operation. Do you know what I'm talking about?

25 A. Yes.

1 Q. Okay. Did -- did the police work with you,  
2 Isabella, to basically try to get Mr. Morejon to  
3 communicate with you, like he thought it was just  
4 you and him, but in fact the police were involved,  
5 kind of set up a sting?

6 A. Yes.

7 Q. All right. And did they use that Instagram, the DM  
8 process to communicate back and forth?

9 A. Yes.

10 Q. Did that happen over one or two days?

11 A. Two days.

12 Q. Two days. Okay. And on the second day, they were  
13 trying to get Mr. Morejon to come try to meet with  
14 you; correct?

15 A. Yes.

16 Q. And on the second day, he agreed to come meet with  
17 you?

18 A. Yes.

19 Q. And the police apprehended him on the way to  
20 this -- this set-up meeting; correct?

21 A. Right.

22 Q. Is that your understanding?

23 A. Yes.

24 Q. Okay. Was your mom with you there at the police  
25 station when all this was going on?

1 A. Yes.

2 Q. Okay. So was the officer doing the texting, just  
3 pretending to be you -- or, I'm sorry, the  
4 messaging?

5 A. I was doing it and she was watching. And they took  
6 pictures of everything that was said.

7 Q. Okay. So you would physically do it, but they were  
8 observing and documenting what was going on;  
9 correct?

10 A. Yes.

11 Q. All right. And he was arrested in May of 2020;  
12 correct?

13 A. Yes.

14 Q. And after he was arrested for this inappropriate  
15 conduct, Isabella, did you ever receive any messages  
16 from Mr. Morejon again?

17 A. No.

18 Q. Okay. So would the last messages that you ever had  
19 or any communication back and forth with  
20 Mr. Morejon, would that have been on the May  
21 13th-14th time period of 2020?

22 A. Yes.

23 Q. Okay. Do you know where Mr. Morejon is today?

24 A. Roughly.

25 Q. Where is he?



1 A. D of C in -- I don't remember what town it is.

2 Q. Okay. How do -- how do you that -- how do you know  
3 that?

4 A. I get texts and he just went up for parole.

5 Q. So they let you know what his status is, the  
6 Department of Corrections?

7 A. Yes.

8 Q. Okay. Has he made any attempt, Isabella, to try to  
9 reach out to you since he was arrested?

10 A. No.

11 Q. He has not tried to send you like any  
12 communications, any letters?

13 A. (Witness shakes head back and forth.)

14 Q. Is that correct?

15 A. Yes.

16 Q. All right. He hasn't tried to communicate through  
17 any of his friends or anyone he knew to try to reach  
18 out to you; in other words, using someone else?

19 A. No.

20 Q. Okay. Is there anything that went on during all  
21 the time from your eighth grade year until he was  
22 arrested in May of 2020 that you felt was  
23 inappropriate between and you Mr. Morejon that we  
24 have not discussed, or have we covered it all?

25 A. No.

1 Q. We haven't covered it all?

2 A. No.

3 Q. What did we not cover?

4 A. We have.

5 Q. Oh, we have?

6 A. Yes.

7 Q. Okay. At the criminal case, did you ever have to  
8 go testify?

9 A. No.

10 Q. All right. Was a -- do you know what happened with  
11 the criminal case? Are you aware he pled guilty and  
12 he went to prison?

13 A. Yes.

14 Q. Okay. Did you ever have to write out what's called  
15 a victim impact statement?

16 A. Yes.

17 Q. You did write out a victim impact statement?

18 A. (Witness nods head up and down.)

19 Q. Okay. Did you go down and read that at his  
20 sentencing or was that something that just was  
21 submitted to the Court?

22 A. I had the D.A. read it.

23 Q. Were you physically there?

24 A. Yes.

25 Q. Okay. So you were there for his sentencing?

1 A. Yes.

2 Q. Okay. Isabella, had you had any other teacher or  
3 employee of Stillwater Public Schools other than  
4 Mr. Morejon that acted inappropriate towards you in  
5 any sexual way?

6 A. No.

7 Q. Okay. So I know we all have strengths and  
8 weaknesses in school. I think I already admitted to  
9 you math was not my strength. Did you have certain  
10 subjects that you were better at than others?

11 A. History I was good at and science.

12 Q. Okay.

13 A. And I didn't like math or English.

14 Q. All right. So you're with me on the math thing;  
15 right?

16 A. (Witness nods head up and down.)

17 Q. Okay. And I know we all are -- when we go through  
18 school, especially when we're young, you know, we  
19 don't always have it all figured out or, you know,  
20 sometimes we take things more seriously than other  
21 times of our life. What kind of student would you  
22 say you've been through school? Are you an A/B? A  
23 B/C? If you kind of had to -- I don't -- I don't  
24 know you, so I'm just asking. What kind of student  
25 have you historically been?

1 A. Previously to all this, I was A/B. And now, after,  
2 C/D.

3 Q. Okay. All right. Did you ever remember when you  
4 were a student at Stillwater the school district  
5 meeting with you and/or your mom about you not  
6 turning in your work?

7 A. No.

8 Q. You don't remember that?

9 A. (Witness shakes head back and forth.)

10 Q. Okay. When -- do you remember switching in the  
11 fall of your eleventh grade year when you came --  
12 when we came back to school from COVID, I believe  
13 that first nine weeks, Stillwater had in-person  
14 learning for the first nine weeks. And then COVID  
15 got really bad in Stillwater when school, college,  
16 everything started back up, and they had to go kind  
17 of shut it down. Do you remember that?

18 A. Yes.

19 Q. Okay. And do you remember switching in October of  
20 2020 to what was referred to as virtual learning?

21 A. Yes.

22 Q. Okay. And do you remember a rule in virtual  
23 learning, that if you didn't turn in work for ten  
24 days straight, they would -- you would be dropped  
25 from the program?

1 A. Yes.

2 Q. Do you remember repeatedly getting dropped for not  
3 turning in your work and then it -- you would turn  
4 in work and you'd get reinstated?

5 A. No.

6 Q. You don't remember that?

7 A. No.

8 Q. Okay. Do you remember your coach, your volleyball  
9 coach, Kyle, talking to you about missing practices?

10 A. No.

11 Q. You don't remember that?

12 A. No.

13 Q. Okay. You don't remember Kyle talking to your mom  
14 about you missing practices?

15 A. No.

16 Q. Would you agree that a part of being a team is  
17 showing up for practice?

18 A. Yes.

19 Q. Do you think players that don't consistently show  
20 up for practice should get to start and get  
21 significant playing time?

22 A. No.

23 Q. Okay. Do you remember an incident with the FFA  
24 program where you had let some individuals in the  
25 barn?

1 A. Yes.

2 Q. Some boys?

3 A. Yes.

4 Q. That were not part of the program?

5 A. One of them was.

6 Q. Okay.

7 A. But yes.

8 Q. Some of them were not; right?

9 A. Right.

10 Q. And do you remember an incident with the -- some of  
11 the animals and these boys?

12 A. Yes.

13 Q. Okay. And you would agree with me that the rules  
14 were people that are not part of the program  
15 shouldn't be in there messing with other people's  
16 animals. Would you agree with that?

17 A. No.

18 Q. You don't agree with that?

19 A. No.

20 Q. Okay. All right. Would there be any reason for  
21 people to be kicking or disturbing other people's  
22 animals?

23 MR. BLAKEMORE: Object to form.

24 Q. (By Mr. Priddy) Would there be any reason for  
25 that?

1 A. No.

2 Q. Would that be appropriate?

3 A. No.

4 Q. All right. Were you disciplined by the FFA program  
5 for that?

6 A. Yes, but not for kicking animals.

7 Q. Okay. What was it for?

8 A. They said that somebody had roped a chicken.

9 Q. Roped them?

10 A. Yes.

11 Q. Lassoed them?

12 A. Yes.

13 Q. Okay. And that was on video?

14 A. Right.

15 Q. Right. And those were -- that was one of the boys  
16 you let in?

17 A. Right.

18 Q. All right. And you would agree that's totally  
19 inappropriate?

20 A. Yes.

21 Q. All right. And because of that, they suspended  
22 your right to use the barn for a period of time;  
23 correct?

24 A. No.

25 MR. BLAKEMORE: Object to form.

1 Q. (By Mr. Priddy) They did not?

2 A. No.

3 Q. That didn't happen?

4 A. They kicked me out.

5 Q. They kicked you out?

6 A. Yes.

7 Q. Okay. So your testimony under oath is they kicked  
8 you out of the program for that?

9 A. Yes.

10 Q. All right. What was that time period that that  
11 happened? Was that January of '21? Fall of '22 --  
12 I mean fall of '20?

13 A. Yes.

14 Q. Which one?

15 A. Fall of '20.

16 Q. Okay.

17 (Exhibit No. 3 marked for identification.)

18 Q. (By Mr. Priddy) All right. Let me hand you what I  
19 just marked as Exhibit No. 3 to your deposition,  
20 Isabella, and see if you can take a look at that.  
21 Can you read that?

22 A. Yes.

23 Q. What does that say? Can you read that first  
24 paragraph for me, please?

25 A. (As read): "On Saturday, January 9, Bella entered



1 Schools, Isabella, that ever said anything after all  
2 this came to light about Mr. Morejon, any employee  
3 that said anything to you about that situation that  
4 you thought was unprofessional or inappropriate?

5 A. No.

6 Q. Okay. Do you have any reason to believe that the  
7 volleyball coach, Kyle, treated you any differently  
8 because of what happened with Mr. Morejon?

9 A. Yes.

10 Q. Okay. Why do you believe that?

11 A. He wouldn't talk to me there -- before, we had --  
12 we were pretty close, and then after, he wouldn't  
13 say anything.

14 Q. Okay. So prior to this coming out with  
15 Mr. Morejon, he would speak with you a lot?

16 A. Right.

17 Q. My understanding of what you're telling me?

18 A. Yes.

19 Q. Okay. And then after the situation with  
20 Mr. Morejon came out, he would not talk to you?

21 A. Right.

22 Q. Okay. Did he ever tell you that was because of  
23 Mr. Morejon?

24 A. No.

25 Q. Okay. So that's -- that's your opinion that's why;

1 correct?

2 MR. BLAKEMORE: Object to form.

3 Q. (By Mr. Priddy) Is that what I'm understanding?

4 MR. BLAKEMORE: Object to form.

5 A. I guess.

6 Q. (By Mr. Priddy) Okay.

7 A. Sure.

8 Q. Well, has anyone ever told you the reason is what  
9 I'm asking.

10 A. No.

11 Q. Okay. Anyone else that you would say that you --  
12 it's your opinion they treated you differently  
13 because of Mr. Morejon with Stillwater Public  
14 Schools?

15 A. I mean, all the teachers that I had, it was just  
16 like they were standoff -- like they didn't want to  
17 get in trouble for talking or having a relationship  
18 with me.

19 Q. Okay. Well, when this came to light, Isabella, you  
20 guys were in the distance learning; right?

21 A. Right.

22 Q. So you weren't physically at school?

23 A. Right.

24 Q. Okay. And then in the fall you guys came back for  
25 nine weeks that it was an A/B schedule. Do you